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Attorneys for Defendants FREMANTLE  
PRODUCTIONS NORTH AMERICA, INC. and  
MARATHON PRODUCTIONS, INC.

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RUSSEL G. GREER,

Plaintiff,

v.

FREMANTLE PRODUCTIONS NORTH  
AMERICA, INC, a corporation and  
MARATHON PRODUCTIONS, INC, a  
corporation,

Defendants.

Case No. 2:21-cv-01905-RFB-NJK

Judge Richard F. Boulware, II

Magistrate Judge Nancy J. Koppe

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME TO  
RESPOND TO AMENDED MOTION  
FOR PRELIMINARY INJUNCTION  
[ECF NO. 52]**

1 Plaintiff Russell G. Greer (“Greer”), in pro per person, and Defendants Fremantle  
2 Productions North America, Inc. and Marathon Productions, Inc. (collectively, “Fremantle”), by  
3 and through counsel, hereby agree and stipulate as follows:

4 WHEREAS, on January 28, 2022, Greer filed an Amended Motion for a Preliminary  
5 Injunction (the “PI Motion”), *see* Dkt. 27;

6 WHEREAS, on February 3, 2022, Fremantle and Greer stipulated that—for party and  
7 judicial efficiency—Fremantle should not oppose the PI Motion until and unless the Court  
8 denies Fremantle’s currently pending Motion to Compel Arbitration and that Fremantle should  
9 have at least two weeks from such order to oppose the PI Motion in such event, *see* Dkt. 30;

10 WHEREAS, on February 8, 2022, the Court granted the Parties’ stipulation, *see* Dkt. 37;

11 WHEREAS, on May 18, 2022, Greer filed a further Amended Motion for a Preliminary  
12 Injunction (the “Amended PI Motion”), Dkt. 52;

13 WHEREAS, Fremantle and Greer agree that the Parties’ prior stipulation and the Court’s  
14 February 8, 2022 Order should apply with equal force to the Amended PI Motion;

15 WHEREAS, Fremantle and Greer further agree that Fremantle should not oppose the  
16 Amended PI Motion until and unless the Court denies Fremantle’s currently pending Motion to  
17 Compel Arbitration and that Fremantle should have at least two weeks from such order to  
18 oppose the Amended PI Motion in such event;

19 WHEREAS, the Parties otherwise reserve all rights.

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1 Dated this 23rd day of May 2022.

2 RUSSELL G. GREER

3 /s/ Russell G. Greer

4 Russell G. Greer  
5 russmark@gmail.com  
6 P.O. Box 46602  
7 Las Vegas, NV 89114  
8 Phone 801-895-3501

9 *Pro Se Litigant*

12 IT IS SO ORDERED:

Dated this 23rd day of May 2022.

HONE LAW

/s/ Joel Z. Schwarz

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*Attorneys for Defendants*

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15   
16 **RICHARD E. BOULWARE, II**  
17 **United States District Court**

18 DAYED this 24th day of May, 2022.